

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MID-AMERICA CARPENTERS REGIONAL)	
COUNCIL)	
Plaintiff,)	
vs.)	No. 4:22-cv-00291
ALBERT BOND, INTERRAIL OUTDOOR,)	
LLC and FOXPOINT INTERACTIVE, LLC)	
Defendants.)	

CONSENT MOTION FOR
EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

Defendants Interrail Outdoor, LLC and Foxpoint Interactive, LLC, by and through counsel, respectfully request an extension of twenty (20) days to file an Answer or other responsive pleading to Plaintiff's Complaint in the above captioned case. In support of this unopposed Motion, Defendants state:

1. Defendants' current deadline to respond to Plaintiff's Complaint is Tuesday, April 5, 2022.
2. No prior extensions have been sought by, or granted to, Defendants.
3. Defendants' counsel requires additional time to prepare its pleadings responsive to Plaintiff's Complaint as Defendants' counsel learned yesterday of information which requires additional investigation in order to confirm whether Defendants' responsive pleading must contain certain compulsory components or Defendants risk potential waiver of same.
4. This motion is not made for purposes of hindrance or delay.
5. Counsel for Defendants has consulted with counsel for Plaintiff regarding the extension, and counsel for Plaintiff has no objection to the relief requested in this motion.

6. These circumstances demonstrate good cause for the requested extension of time, which will not unduly delay the efficient progress of this case.

WHEREFORE, Defendants Interrail Outdoor, LLC and Foxpoint Interactive, LLC respectfully request that the Court enter an Order extending up to and including Monday, April 25, 2022, the time within which Defendants may file its pleadings responsive to Plaintiff's Complaint, and providing such other and further relief as the Court deems just and proper.

Respectfully submitted,

DATED: April 1, 2022

ARMSTRONG TEASDALE LLP

By: /s/ Evan J. Sullivan

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ATTORNEYS FOR INTERRAIL OUTDOOR, LLC
and FOXPOINT INTERACTIVE, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 1st day of April, 2022, a true and correct copy of the foregoing document was e-filed with the Court's electronic filing system, which emailed a copy of the foregoing document to all attorneys of record.

/s/ Evan J. Sullivan